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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CREIGHTON TAKATA, individually and on behalf of all others similarly situated,)
) Civil Action No.: 18-2293
) (FLW)(ZNQ)
)
Plaintiff,) Hon. Zahid N. Quraishi
)
v.) NOTICE OF MOTION FOR PRO HAC VICE ADMISSION OF
) THOMAS O. GORMAN
RIOT BLOCKCHAIN, INC. f/k/a BIOPTIX, INC., JOHN O'ROURKE, JEFFREY MCGONEGAL, BARRY HONIG, CATHERINE DEFRANCESCO, MICHAEL BEEGHLEY, JOHN STETSON, MARK GROUSSMAN, ANDREW KAPLAN, MIKE DAI, JASON LES and ERIC SO,)
) Return Date: September 16, 2019
)
Defendants.)

PLEASE TAKE NOTICE that on September 16, 2019, at a time to be set by the Court, counsel for Defendant Mike Dai shall move pursuant to Local Civil Rule 101.1(c) before the Honorable Zahid N. Quraishi, at the United States District Court for the District of New Jersey, Clarkson S. Fisher Building and United States

Courthouse, 402 East State Street, Trenton, New Jersey, for the entry of an Order granting admission *pro hac vice* to Thomas O. Gorman, of the law firm of Dorsey & Whitney, LLP for the purpose of appearing, participating, and representing Defendant Mike Dai in this action.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, counsel for Defendant Mike Dai submits the Certification of Laura Lestrade, as well as the supporting Certification of Thomas O. Gorman.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted with this motion.

DATED: August 23, 2019

Respectfully submitted,

DORSEY & WHITNEY LLP

By: /s/ *Laura M. Lestrade*
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